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IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff.

V

JULIO CESAR SARABIA,
MICHAEL WILLIAM HUTCHISON III,
JOSE MIGUEL HERNANDEZ JR.,
MULAN PRECIOUS KEOPHIMANH,
JOHNNY BOBBY TRUONG,
GUADALUPE MANUEL CERVANTES,
aka "Pep," and
TANYA DUERELLE LAWSON,

Defendants.

CASE NO. 2:24-cr-0164 TLN

21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine; 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine (3 counts); 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Cocaine; 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Heroin; 21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine (10 counts); 21 U.S.C. § 841(a)(1) – Distribution of Fentanyl (2 counts); 21 U.S.C. § 841(a)(1) – Distribution of Heroin; 21 U.S.C. § 853(a) – Criminal Forfeiture

<u>INDICTMENT</u>

<u>COUNT ONE</u>: [21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine]

The Grand Jury charges: THAT

JULIO CESAR SARABIA,
MICHAEL WILLIAM HUTCHISON III,
JOSE MIGUEL HERNANDEZ JR,
MULAN PRECIOUS KEOPHIMANH,
JOHNNY BOBBY TRUONG,
GUADALUPE MANUEL CERVANTES, and
TANYA DUERELLE LAWSON,

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defendants herein, beginning on an unknown date, but no later than on or about January 26, 2023, and continuing through on or about May 10, 2024, in the County of Sacramento, State and Eastern District of California, and elsewhere, did conspire and agree with each other and with persons both known and unknown to the Grand Jury to knowingly and intentionally distribute and possess with intent to distribute at least 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

COUNT TWO: [21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine]

The Grand Jury further charges: T H A T

MICHAEL WILLIAM HUTCHISON III,

defendant herein, on or about February 3, 2023, in the County of Sacramento, State and Eastern District of California, did knowingly and intentionally distribute at least 50 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

<u>COUNT THREE</u>: [21 U.S.C. § 841(a)(1) – Distribution of Fentanyl]

The Grand Jury further charges: T H A T

MICHAEL WILLIAM HUTCHISON III,

defendant herein, on or about February 3, 2023, in the County of Sacramento, State and Eastern District of California, did knowingly and intentionally distribute at least 40 grams of a mixture and substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as "fentanyl," a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR: [21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine]

The Grand Jury further charges: THAT

MICHAEL WILLIAM HUTCHISON III,

defendant herein, on or about March 9, 2023, in the County of Sacramento, State and Eastern District of California, did knowingly and intentionally distribute at least 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

INDICTMENT 2

COUNT FIVE: [21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine] 1 2 The Grand Jury further charges: THAT 3 JULIO CESAR SARABIA, and MICHAEL WILLIAM HUTCHISON III, 4 5 defendants herein, on or about April 12, 2023, in the County of Sacramento, State and Eastern District 6 of California, did knowingly and intentionally distribute at least 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of 7 8 Title 21, United States Code, Section 841(a)(1). 9 COUNT SIX: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine] The Grand Jury further charges: THAT 10 11 JULIO CESAR SARABIA, and 12 MICHAEL WILLIAM HUTCHISON III. defendants herein, on or about May 19, 2023, in San Joaquin County, State and Eastern District of 13 California, did knowingly and intentionally possess with intent to distribute at least 500 grams of a 14 mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled 15 16 Substance, in violation of Title 21, United States Code, Section 841(a)(1). COUNT SEVEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine] 17 The Grand Jury further charges: T H A T 18 19 JULIO CESAR SARABIA, MICHAEL WILLIAM HUTCHISON III, and TANYA DUERELLE LAWSON, 20 defendants herein, on or about June 6, 2023, in Sacramento County, State and Eastern District of 21 California, did knowingly and intentionally possess with intent to distribute at least 500 grams of a 22 mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled 23 Substance, in violation of Title 21, United States Code, Section 841(a)(1). 24 /// 25 /// 26 27 28

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INDICTMENT

COUNT EIGHT: [21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine] 1 2 The Grand Jury further charges: T H A T MICHAEL WILLIAM HUTCHISON III, 3 defendant herein, on or about July 31, 2023, at approximately 4:32 p.m., in the County of Sacramento, 5 State and Eastern District of California, did knowingly and intentionally distribute at least 50 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled 6 Substance, in violation of Title 21, United States Code, Section 841(a)(1). 7 COUNT NINE: [21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine] 9 The Grand Jury further charges: THAT 10 MICHAEL WILLIAM HUTCHISON III, and JOHNNY BOBBY TRUONG, 11 defendants herein, on or about July 31, 2023, at approximately 6:06 p.m., in the County of Sacramento, 12 State and Eastern District of California, did knowingly and intentionally distribute at least 500 grams of 13 a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled 14 Substance, in violation of Title 21, United States Code, Section 841(a)(1). 15 16 <u>COUNT TEN</u>: [21 U.S.C. § 841(a)(1) – Distribution of Heroin] The Grand Jury further charges: THAT 17 18 MICHAEL WILLIAM HUTCHISON III, and JOHNNY BOBBY TRUONG, 19 defendants herein, on or about July 31, 2023, at approximately 6:06 p.m., in the County of Sacramento, 20 State and Eastern District of California, did knowingly and intentionally distribute a mixture and 21 substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1). 23 /// 24 /// 25 /// 26 27 28

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COUNT ELEVEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine] 1 2 The Grand Jury further charges: T H A T 3 JULIO CESAR SARABIA. MICHAEL WILLIAM HUTCHISON III. MULAN PRECIOUS KEOPHIMANH, and 5 JOHNNY BOBBY TRUONG, defendants herein, on or about September 16, 2023, in Sacramento County, State and Eastern District of 6 California, did knowingly and intentionally possess with intent to distribute at least 500 grams of a 7 mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1). COUNT TWELVE: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Cocaine] 10 11 The Grand Jury further charges: THAT 12 JULIO CESAR SARABIA, 13 MICHAEL WILLIAM HUTCHISON III, MULAN PRECIOUS KEOPHIMANH, and JOHNNY BOBBY TRUONG, 14 defendants herein, on or about September 16, 2023, in Sacramento County, State and Eastern District of 15 16 California, did knowingly and intentionally possess with intent to distribute at least 500 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in 17 violation of Title 21, United States Code, Section 841(a)(1). 18 <u>COUNT THIRTEEN</u>: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Heroin] 19 20 The Grand Jury further charges: THAT 21 JULIO CESAR SARABIA. MICHAEL WILLIAM HUTCHISON III, 22 MULAN PRECIOUS KEOPHIMANH, and 23 JOHNNY BOBBY TRUONG, defendants herein, on or about September 16, 2023, in Sacramento County, State and Eastern District of 24 California, did knowingly and intentionally possess with intent to distribute at least 100 grams of a 25 mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in 26 violation of Title 21, United States Code, Section 841(a)(1) 27

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Indictment

<u>COUNT FOURTEEN</u>: [21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine] 1 2 The Grand Jury further charges: THAT 3 MICHAEL WILLIAM HUTCHISON III, defendant herein, on or about November 1, 2023, in the County of Sacramento, State and Eastern 4 District of California, did knowingly and intentionally distribute at least 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in 6 violation of Title 21, United States Code, Section 841(a)(1). 8 <u>COUNT FIFTEEN</u>: [21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine] 9 The Grand Jury further charges: T H A T 10 MICHAEL WILLIAM HUTCHISON III, and MULAN PRECIOUS KEOPHIMANH, 11 defendants herein, on or about January 16, 2024, in the County of Sacramento, State and Eastern District 12 of California, did knowingly and intentionally distribute at least 500 grams of a mixture and substance 13 14 containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1). 15 <u>COUNT SIXTEEN</u>: [21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine] 16 The Grand Jury further charges: T H A T 17 18 JOSE MIGUEL HERNANDEZ JR, defendant herein, on or about February 22, 2024, in the County of Sacramento, State and Eastern 19 District of California, did knowingly and intentionally distribute at least 500 grams of a mixture and 20 substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in 21 violation of Title 21, United States Code, Section 841(a)(1). 22 /// 23 /// 24 25 /// 26 27 28

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Indictment

COUNT SEVENTEEN: [21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine]

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The Grand Jury further charges: T H A T

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MICHAEL WILLIAM HUTCHISON III, and JOSE MIGUEL HERNANDEZ JR,

defendants herein, on or about February 28, 2024, in the County of Sacramento, State and Eastern District of California, did knowingly and intentionally distribute at least 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHTEEN: [21 U.S.C. § 841(a)(1) – Distribution of Fentanyl]

The Grand Jury further charges: THAT

MICHAEL WILLIAM HUTCHISON III,

defendant herein, on or about March 3, 2024, in the County of Sacramento, State and Eastern District of California, did knowingly and intentionally distribute at least 40 grams of a mixture and substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as "fentanyl," a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

<u>COUNT NINETEEN</u>: [21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine]

The Grand Jury further charges: T H A T

JOSE MIGUEL HERNANDEZ JR,

defendant herein, on or about April 2, 2024, in the County of Sacramento, State and Eastern District of California, did knowingly and intentionally distribute at least 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE ALLEGATION: [21 U.S.C. § 853(a) - Criminal Forfeiture]

1. Upon conviction of one or more of the offenses alleged in Counts One through Nineteen of this Indictment, defendants JULIO CESAR SARABIA, MICHAEL WILLIAM HUTCHISON III, JOSE MIGUEL HERNANDEZ, JR., MULAN PRECIOUS KEOPHIMANH, JOHNNY BOBBY

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No.					

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

VS. NO PROCESS NECESSARY

JULIO CESAR SARABIA,
MICHAEL WILLIAM HUTCHISON III,
JOSE MIGUEL HERNANDEZ JR.,
MULAN PRECIOUS KEOPHIMANH,
JOHNNY BOBBY TRUONG,
GUADALUPE MANUEL CERVANTES,
AKA "PEP," AND
TANYA DUERELLE LAWSON,

INDICTMENT

VIOLATION(S): 21 U.S.C. §§ 846, 841 – Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine; 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine (3 counts); 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Cocaine; 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Heroin; 21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine (10 counts); 21 U.S.C. § 841(a)(1) – Distribution of Fentanyl (2 counts); 21 U.S.C. § 841(a)(1) – Distribution of Heroin; 21 U.S.C. § 853(a) – Criminal Forfeiture

A true bill,	/s/ Signature on file w/AUSA
Filed in open court this _	Foreman. 6thday
of <u>June</u>	, A.D. 20 <u>24</u>
	/s/ L. Kennison
NO PROCESS N	Carop U. Delany

<u>United States v. Julio Cesar Sarabia, et al.</u> Penalties for Indictment

Defendants

JULIO CESAR SARABIA
MICHAEL WILLIAM HUTCHISON III
JOSE MIGUEL HERNANDEZ JR
MULAN PRECIOUS KEOPHIMANH
JOHNNY BOBBY TRUONG
GUADALUPE MANUEL CERVANTES
TANYA DUERELLE LAWSON

COUNT 1: ALL DEFENDANTS

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute at least 500

Grams of a Mixture or Substance Containing a Detectable Amount

of Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and up to life in prison;

or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNTS 2, 8: MICHAEL WILLIAM HUTCHISON III

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of at least 50 Grams of a

Mixture or Substance Containing a Detectable Amount of

Methamphetamine

PENALTIES: Mandatory minimum of 5 years in prison and up to 40 years in

prison; or

Fine of up to \$5,000,000; or both fine and imprisonment Supervised release of at least 4 years and up to life

COUNTS 3, 18: MICHAEL WILLIAM HUTCHISON III

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of at least 40 Grams of a

Mixture or Substance Containing a Detectable Amount of Fentanyl

PENALTIES: Mandatory minimum of 5 years in prison and up to 40 years in

prison; or

Fine of up to \$5,000,000; or both fine and imprisonment Supervised release of at least 4 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNTS 4, 14: MICHAEL WILLIAM HUTCHISON III

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of at least 500 Grams of a

Mixture or Substance Containing a Detectable Amount of

Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and up to life in prison;

or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNT 5: JULIO CESAR SARABIA

MICHAEL WILLIAM HUTCHISON III

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of at least 500 Grams of a

Mixture or Substance Containing a Detectable Amount of

Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and up to life in prison;

or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years and up to life

COUNT 6: JULIO CESAR SARABIA

MICHAEL WILLIAM HUTCHISON III

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute at least

500 Grams of a Mixture or Substance Containing a Detectable

Amount of Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and up to life in prison;

or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNT 7: JULIO CESAR SARABIA

MICHAEL WILLIAM HUTCHISON III

TANYA DUERELLE LAWSON

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute at least

500 Grams of a Mixture or Substance Containing a Detectable

Amount of Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and up to life in prison;

or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNT 9: MICHAEL WILLIAM HUTCHISON III

JOHNNY BOBBY TRUONG

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of at least 500 Grams of a

Mixture or Substance Containing a Detectable Amount of

Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and up to life in prison;

or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years and up to life

COUNT 10: MICHAEL WILLIAM HUTCHISON III

JOHNNY BOBBY TRUONG

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of a Mixture or Substance

Containing a Detectable Amount of Heroin

PENALTIES: Up to 20 years in prison; or

Fine of up to \$1,000,000; or both fine and imprisonment

Supervised release of at least 3 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNT 11: JULIO CESAR SARABIA

MICHAEL WILLIAM HUTCHISON III MULAN PRECIOUS KEOPHIMANH

JOHNNY BOBBY TRUONG

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of at least 500 Grams of a

Mixture or Substance Containing a Detectable Amount of

Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and up to life in prison;

or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNT 12: JULIO CESAR SARABIA

MICHAEL WILLIAM HUTCHISON III MULAN PRECIOUS KEOPHIMANH

JOHNNY BOBBY TRUONG

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute at least

500 Grams of a Mixture or Substance Containing a Detectable

Amount of Cocaine

PENALTIES: Mandatory minimum of 5 years in prison and up to 40 years in

prison; or

Fine of up to \$5,000,000; or both fine and imprisonment Supervised release of at least 4 years and up to life

COUNT 13: JULIO CESAR SARABIA

MICHAEL WILLIAM HUTCHISON III MULAN PREČIOUS KEOPHIMANH

JOHNNY BOBBY TRUONG

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute at least

100 Grams of a Mixture or Substance Containing a Detectable

Amount of Heroin

PENALTIES: Mandatory minimum of 5 years in prison and up to 40 years in

prison; or

Fine of up to \$5,000,000; or both fine and imprisonment Supervised release of at least 4 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNT 15: MICHAEL WILLIAM HUTCHISON III

MULAN PRECIOUS KEOPHIMANH

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of at least 500 Grams of a

Mixture or Substance Containing a Detectable Amount of

Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and up to life in prison;

or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNTS 16, 19: JOSE MIGUEL HERNANDEZ

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of at least 500 Grams of a

Mixture or Substance Containing a Detectable Amount of

Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and up to life in prison;

or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years and up to life

COUNT 17: MICHAEL WILLIAM HUTCHISON III

JOSE MIGUEL HERNANDEZ

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of at least 500 Grams of a

Mixture or Substance Containing a Detectable Amount of

Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and up to life in prison;

or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

FORFEITURE ALLEGATION: ALL DEFENDANTS

VIOLATION: 21 U.S.C. § 853(a) – Criminal Forfeiture

PENALTIES: As stated in the charging document